

EXHIBIT A

From: Warren Postman <wdp@kellerlenkner.com>
Sent: Friday, March 19, 2021 6:45 PM
To: Mehta, Sonal
Cc: Ashley Keller; Gringer, David
Subject: Confirmation of ethical screen in Klein v. Facebook

EXTERNAL SENDER

Sonal,

At the hearing yesterday, you noted that, as part of his former employment at Kellogg Hansen, a lawyer at Keller Lenkner represented Facebook in an antitrust matter. You also said Facebook would want to determine whether that attorney has been screened from the *Klein* case.

We assume that the lawyer to whom you were referring is Albert Pak. I'm writing to confirm that Albert was promptly screened from the *Klein* matter. KL imposed a screen to wall off Mr. Pak from the *Klein* matter beginning on November 11, 2020. At that time, KL had not been retained by any client adverse to Facebook; Quinn Emanuel and KL had not yet agreed to co-counsel on, or file any case against, Facebook, and no KL lawyer had yet worked on any draft of the *Klein* complaint. Only after the screening procedures were put in place did KL agree to join Quinn Emanuel in pursuing claims against Facebook and begin working on a draft complaint.

KL imposed the following screening measures:

- All KL attorneys and staff are required to store electronic documents on our cloud-based document management system. Access to all documents related to the *Klein* matter is restricted to exclude Albert.
- All KL attorneys and staff were notified by email, marked "high priority," on November 11, 2020 that Albert had been screened from—and could not have any involvement in—the potential antitrust case KL was considering pursuing against Facebook.
- All attorneys and staff were further directed not to:
 - Speak to Albert about the potential case or any related issues;
 - Save any Facebook-related files outside of the Facebook workspace on the document management system; or
 - Leave physical case materials in unlocked or open areas that could be accessed by anyone not working on the matter.
- During a quarterly all-firm meeting conducted via Zoom on December 4, 2020, all KL attorneys and staff were reminded of this (and other) ethical screens in place at the firm and the attendant restrictions.
- All attorneys and staff who join KL are informed of this (and other) ethical screens in place at the firm and the attendant restrictions.
- The main KL "intranet" page for attorneys and staff lists current ethical screens in place at the firm, including this one.

We are committed to honoring these procedures scrupulously throughout the life of the *Klein* case. If you would like to discuss or have further questions about these procedures, please let us know and we will respond promptly.

Sincerely,

Warren Postman

Partner

Keller | Lenkner

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